

Michael Kind, Esq.
Nevada Bar No.: 13903
KAZEROUNI LAW GROUP, APC
6069 S. Fort Apache Rd., Ste. 100
Las Vegas, NV 89148
Phone: (800) 400-6808 x7
Fax: (800) 520-5523
mkind@kazlg.com

David H. Krieger, Esq.
Nevada Bar No.: 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Ste. 350
Henderson, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com
Attorneys for Plaintiff Robert E. Strahl

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Robert E. Strahl,

Plaintiff,

v.

Experian Information Solutions,
Inc.,

Defendant.

Case No. 2:17-cv-02981-JAD-PAL

**Joint Stipulation and Order to
Extend Discovery**

(First Request)

Plaintiffs Robert E. Strahl (“Plaintiff”) and Experian Information Services, Inc., (“Defendant” and together with Plaintiff as the “Parties”) by and through their counsel of record hereby stipulate to modify the Court’s Order, ECF No. 8, to extend:

- (1) the last date to disclose experts from May 2, 2018, to **June 1, 2018**
- (2) the last date to disclose rebuttal experts from June 1, 2018, to **July 2, 2018**
- (3) the last date to complete discovery from July 2, 2018, to **July 31, 2018**;
- (4) the last date to file dispositive motions from July 31, 2018, to **August 30, 2018**; and
- (5) the last date to file the proposed joint pretrial order from August 30, 2018, to **September 29, 2018**.

Pursuant to LR 26-4, good cause exists to amend the Scheduling Order. The Parties are actively engaged in discovery. Plaintiff has propounded written discovery requests on Defendant. Defendant is having an attorney transition of its national counsel and has requested an extension to respond to Plaintiff's discovery requests, and Plaintiff agreed. Plaintiff also served subpoenas on Ocwen Loan Servicing, LLC, a non party in this case. The Parties ran into scheduling conflicts with Experian's Rule 30(b)(6) witness. Plaintiff has requested dates for Experian's depositions and Experian said it will provide dates for its deposition shortly. Furthermore, Plaintiff and Experian are actively discussing resolution of this case. This request for extension of deadlines is made specifically in this fee-shifting matter since the taking of depositions are a significant expense. It would be prejudicial to Plaintiff if expert disclosure expires before Plaintiff can take Defendant's deposition and the Parties therefore seek to extend the expert disclosures deadlines and the corresponding discovery deadlines.

Pursuant to LR 26-4(a), Plaintiff has propounded written discovery requests upon Defendant and third party discovery.

Pursuant to LR 26-4(b), the Parties request additional time to continue to meet and confer about discovery disputes, conduct depositions and disclose experts, as necessary.

Pursuant to LR 26-4(d), the Parties propose the following discovery schedule:

- (1) the last date to disclose experts shall be **June 1, 2018**

- 1 (2) the last date to disclose rebuttal experts shall be **July 2, 2018**
2 (3) the last date to complete discovery shall be **July 31, 2018**;
3 (4) the last date to file dispositive motions shall be **August 30, 2018**; and
4 (5) the last date to file the proposed joint pretrial order shall be **September**
5 **29, 2018**.

6 For these reasons, the Parties jointly request that this Court modify the
7 Scheduling Order to provide an additional 30 days to complete discovery, and the in
8 the ordinary course file dispositive motions, and the proposed joint pretrial order as
9 described in the proposed timeline above.

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1 This is the Parties' first request for an extension of these deadlines.
2 DATED this 20th day of April 2018.

3 **KAZEROUNI LAW GROUP, APC**

SNELL & WILMER LLP

4 By: /s/ Michael Kind
5 Michael Kind, Esq.
6 6069 S. Fort Apache Rd., Ste 100
7 Las Vegas, NV 89148
8 *Attorneys for Plaintiff*

By: /s/ Charles E. Gianelloni
Charles E. Gianelloni, Esq.
Bob L. Olson, Esq.
3883 Howard Hughes Pkwy., Ste. 1100
Las Vegas, NV 89169
*Attorneys for Equifax Information Services
LLC*

9 **ORDER**

10 IT IS HEREBY ORDERED that the Order, ECF No 8, is modified to extend
11 the discovery deadlines as follows:

- 12 (1) the last date to disclose experts shall be **June 1, 2018**
13 (2) the last date to disclose rebuttal experts shall be **July 2, 2018**
14 (3) the last date to complete discovery shall be **July 31, 2018**;
15 (4) the last date to file dispositive motions shall be **August 30, 2018**; and
16 (5) the last date to file the proposed joint pretrial order shall be **September**
17 **29, 2018**.

18 IT IS SO ORDERED.

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20 UNITED STATES MAGISTRATE JUDGE
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22 Dated: May 8, 2018
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on April 20, 2018, the foregoing stipulations was filed and served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind
Michael Kind
6069 S. Fort Apache Rd., Ste. 100
Las Vegas, NV 89148

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Las Vegas, NV 89148